Wyels, Wendy@Waterboards

Subject: FW: Morning Star NONA
Attachments: 2015-0930 NONA Morning Star_Final.pdf

From: Ditto, Robert@Waterboards
Sent: Friday, January 15, 2016 2:42 PM
To: Wyels, Wendy@Waterboards
Cc: Rosenbaum, Steve@Waterboards; Hold, Howard@Waterboards; Fischer, Michael@Waterboards
Subject: Morning Star NONA

Wendy,

As requested, I have reviewed the Morning Star NONA application submitted in the SMARTS system on 6 October 2015 (application number 464601). The NONA has not been approved yet.

Although the report is signed and stamped by a registered California engineer, we require more information to review the NONA. Please see below for a list of additional information required to review the NONA.

1) Please provide the data set where the precipitation data was obtained.
2) Although the largest storm event was identified, the annual data was not provided. If the largest storm event produced 19.2 inches of precipitation, could the site also contain the annual precipitation? The permit states "At a minimum, Dischargers must ensure that the containment design addresses maximum 1-hour, 24 hour, weekly, monthly, and annual precipitation data for the duration of the exclusion."
3) Provide individual basin capacity, infiltration rates (if applicable), and size of watersheds draining to each basins.
4) Provide a facility site map showing storm water drainage and watershed areas within the industrial portions of the facility (no fields).
5) Provide runoff coefficients used to determine runoff values, provide the calculations.
6) Demonstrate how all water is captured and retained onsite, especially in areas of truck traffic and entrance/exit areas (where tracking can occur).

Let me know if you have any questions, I will be available Tuesday am if more work is needed.

Robert Ditto, CPESC, CPSWQ, QSD
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October 1, 2015

Mr. Ross Oliveira
Morning Star Packing Company
221 Old Hwy 99
Williams, CA 95987

Subject: No Discharge Technical Report for Morning Star Packing Company, Williams, CA

Dear Mr. Oliveira,

The scope of services was conducted to determine if the Morning Star Packing Company (Morning Star), Williams, CA meets the conditions of the 2014-0057-DWQ permit Notice of Non-Applicability (NONA) requirements.

According to the Stormwater General permit (page 68), the following criteria must be met for the facility to be qualify for a NONA:

> *"The facility is engineered and constructed to have contained the maximum historic precipitation event (or series of events) using the precipitation data collected from the National Oceanic and Atmospheric Agency's website (or other nearby precipitation data available from other government agencies) so that there will be no discharge of industrial storm water to waters of the United States…".*

Provost & Pritchard has performed an evaluation of data provided to us by Morning Star. The dimensions of the facility's runoff areas and associated storm water retention basins were obtained from email correspondence from Siegfried Engineering and from the report submitted by Siegfried Engineering dated September 22, 2015 (NPDES Compliance for Morning Star Processing plant in Williams, CA.). Aerial imagery was used to verify the area of the property which contributes to the storm runoff area. The approximate capacity of the cooling pond was estimated using aerial imagery combined with design data contained within the Siegfried Engineering report. The calculated capacity of the new storm retention basin was obtained from the Siegfried Engineering report. The entirety of the facility's storm water runoff, is reported by Morning Star staff to drain to four storm water basins, with additional storage capacity supplied by pumping water from the basins into the cooling pond. These basins are located along the northern, eastern, southern borders of the Morning Star property and are depicted in the Site Map (Figure 1).

Historical data, using the closest official NOAA weather station (Williams CA), was utilized to determine the maximum, storm event or series of storm events pursuant to the requirements of the permit. Data from the year 1893 until the present was analyzed. This maximum series of storm events occurred from December 25, 2005, until January 5, 2006. The combined precipitation from this storm event was a total of 19.2 inches.

Project Number: 353915001

The following table summarizes our findings:

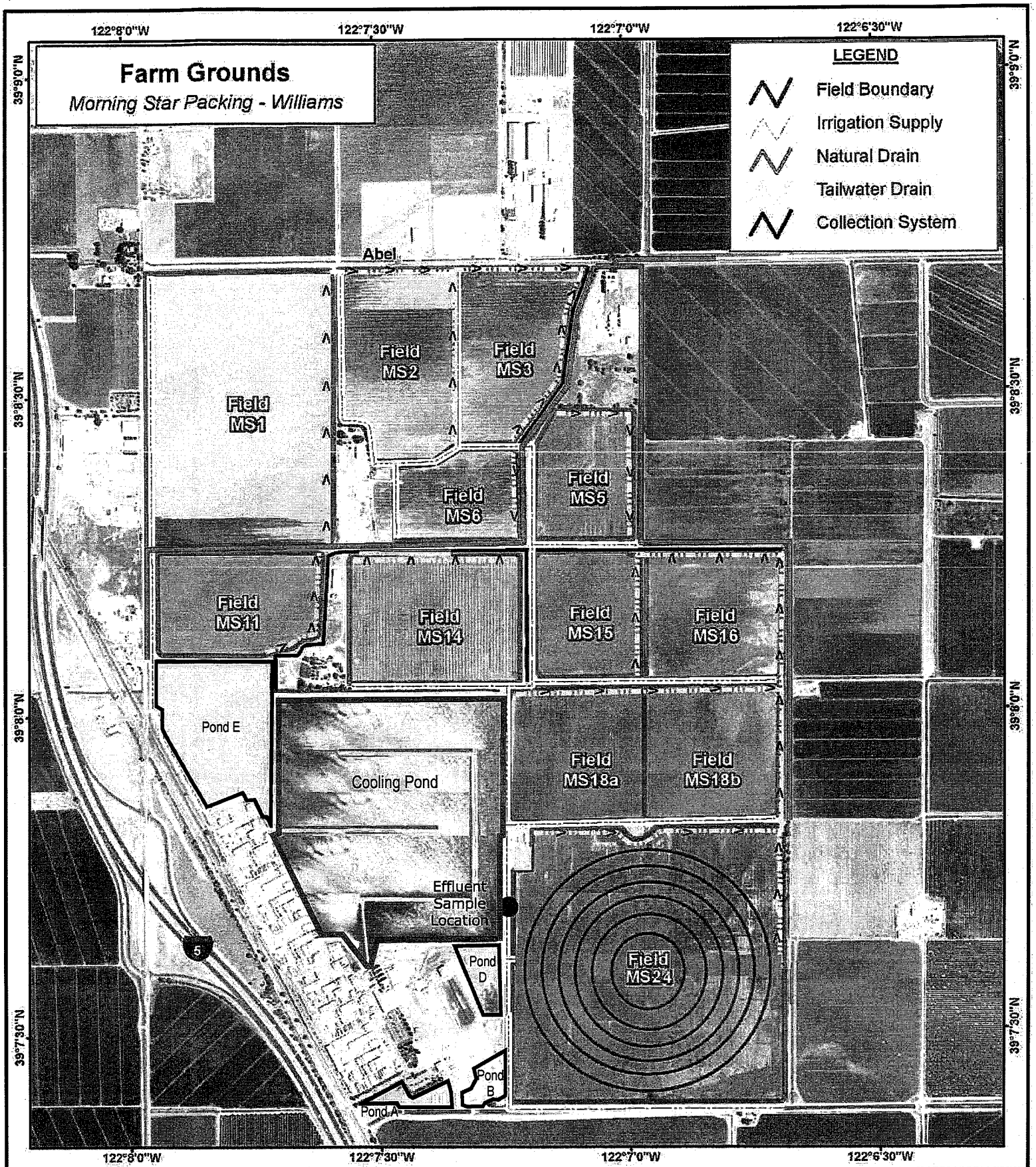
Total Runoff Area	197.9 acres
Historical Rainfall Storm Event	19.2 in
Estimated Storm Water Volume	316.7 acre feet
Existing Storm Water Retention Volume	723 acre feet

Based upon the available data, the existing storm water retention basin capacity is sufficient to contain a historical maximum precipitation event for the facility.

It is important to note that continued maintenance of the storm water retention basins is required to assure that the storm water retention basins do not change in capacity, over time. Additionally, mitigation measures must be maintained to assure that run on from neighboring facilities and that runoff from the Morning Star facility are minimized.

Respectfully Submitted,

HILARY REINHARD, PE, QSD, QSP
Project Manager



CUSTOM MAPPING SERVICES

Custom Mapping Services, L.L.C. does not guarantee the accuracy or content of the data used in this map. Map is intended for pictorial use only and is not to be used for legal purposes.

Figure 1. Facility Map

Map Scale 1:14,400 1 Inch = 1,200 Feet

0 300 600 1,200 1,800 2,400 Feet

N

Data Source:
Aerial Photography: Summer 2012
Projection: UTM Zone 10N, NAD 83
State of California: Colusa County

Map Source:
Custom Mapping Services, L.L.C.
Prairieville, LA (225) 677-7207
Map Date: February 27, 2014
Map ID: CMS2014-038